UNITED STATES DISTRICT COURT WESTERN DISTRICT OF ARKANSAS HOT SPRINGS DIVISION

HAWK TECHNOLOGY SYSTEMS, LLC,

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CASE NO. 6:15-CV-06037-RTD

v.

OAKLAWN JOCKEY CLUB, INC.,

Defendant.

/

UNOPPOSED MOTION FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD FOR PLAINTIFF HAWK TECHNOLOGY SYSTEMS, LLC

Pursuant to Rule 83.5(f) of the Local Rules of the United States District Court for the Western District of Arkansas, Angela M. Lipscomb of Lipscomb, Eisenberg & Baker, P.L., hereby respectfully moves the Court for leave to withdraw as counsel of record for Plaintiff Hawk Technology Systems, LLC and in support thereof state:

- 1. On November 12, 2015, Angela M. Lipscomb filed her Application for Admission to Practice *Pro Hac Vice* [DE 26] which the Court granted on the same day.
- 2. The undersigned has given her client due notice of this intention to withdraw prior to submitting this request to the Court. Plaintiff does not object to undersigned's withdraw in this matter. Further, successor counsel, David A. Bailey, Esq., has been admitted *pro hace vice* and will be representing Plaintiff as lead counsel going forward.
- 3. Withdrawal will neither prejudice nor delay trial, because Joshua Q. Hurst, Esq., Q. Byrum Hurst, Esq. of the Hurst Law Group as well as David A. Bailey, Esq. of the law firm Andrade & Bailey, P.L.L.C., will continue to represent Plaintiff Hawk Technology Systems, LLC.

4. Plaintiff has conferred with counsel for Defendant who confirmed that Defendant does not object to the relief requested herein.

WHEREFORE, Angela M. Lipscomb of Lipscomb, Eisenberg & Baker, P.L., respectfully requests leave of court to withdraw as counsel for the Plaintiff in this matter.

Dated: June 9, 2016

Respectfully submitted,

LIPSCOMB EISENBERG & BAKER, PL

By: /s/ Angela M. Lipscomb

Angela M. Lipscomb, Esq.

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Angela M. Lipscomb

Angela M. Lipscomb, Esq.